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LETTER AND THE RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS AND THE U S NAVY RESPONSE ON THE MONITORING EVENT 18 FALL 2014 SITE 7 CALF PASTURE POINT NCBC DAVISVILLE RI
10/02/2015
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

2 October 2015

Mr. Jeffrey Dale, RPM
US Department of the Navy
BRAC PMO, Northeast
4911 South Broad Street
Building 679, PNBC
Philadelphia, PA 19112

RE: Monitoring Event 18 – Fall 2014
Navy Response to RIDEM 12 June 2015 Comments
Site 07 (Calf Pasture Point)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 10 September 2015, Dated 4 September 2015

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. Comments are provided below:

1. Page 3, Section 2.1, Monitoring Procedures, Paragraph 2 – This paragraph states that " In cases where a sampling point did not provide sufficient recharge to enable stabilization of the water level, the sampling point was evacuated of standing water and allowed to recharge prior to the collection of water quality data and groundwater sample." Wells and piezometers where recharge was insufficient to collect samples the standard way should be so noted in Tables 3 (Groundwater Quality Parameters Measured Prior to Sampling Monitoring Wells), 4 (Groundwater Quality Parameters Measured Prior to Sampling Piezometers), 5 (Analytical Results – Monitoring Wells) and 6 (Analytical Results – Piezometers).

   Navy Response – A footnote will be added to Tables 4 and 6 as appropriate indicating where piezometer grab samples were taken due to insufficient recharge (PO7-03, PO7-04, PO7-06, PO7-08, PO7-15, PO7-20, PO7-21). The footnote will not be added to Tables 3 and5, as during ME18 there were no monitoring wells that did not provide sufficient recharge for low flow sampling.

RIDEM Comment – The paragraph from which the comment was derived implied there was insufficient recharge from both wells and piezometers. Going forward if there is insufficient recharge for either a well or piezometer this should be so noted in the appropriate Table.

2. General Comment – In comparing monitoring events 8 (2/07), 13 (10/09), 14 (4/10) and 18 (fall 14) there seems to be a general increase of TCE in wells MW07-11D (73.5 – 640 ug/l), MW07-34D (337 – 1000 ug/l). Both of these wells are upgradient of wells MW07-20D and MW07-18D which are along Narragansett Bay. Currently wells MW07-16D, 20D, 20S, DPT07-24D and DPT07-24I are located along the shore of Narragansett Bay. Of these wells only DPT07-24D has shown any detectable level of TCE at 78 ug/l. Based on the groundwater contour maps, Figures 7 and 8, ground water is moving toward Narragansett Bay. RIDEM recommends that some piezometers be placed along the shoreline of Narragansett Bay in the vicinity of these shoreline wells to be able to determine if groundwater contamination is making its way to the shoreline and what impacts, if any, this may have on human health and the environment.

   Navy Response – The Navy does not believe that piezometers along Narragansett shoreline are necessary at this time. The contamination in the groundwater moving east towards Narragansett Bay is in the deep overburden and shallow bedrock aquifers; TCE has not ever been detected in shallow shoreline monitoring well MW07-20S. In addition, EPA installed and sampled 31 piezometers along Narragansett Bay in 2010 and did not detect any TCE.

   RIDEM Comment – Navy response is acceptable, though we should keep an eye out on the eastward movement of the plume.

3. General Comment – RIDEM concurs with USEPA comments dated 2 June 2015, particularly comments 1 thru 8. Going forward if there is insufficient recharge for either a well or piezometer this should be so noted in the appropriate Table.

   Navy Response – Comment noted.

   RIDEM Comment – Navy response is acceptable.

RIDEM would like to thank you for the opportunity to comment on this document and looks forward to working with the Navy and USEPA. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at richard.gottlieb@dem.ri.gov.

Sincerely,

Richard Gottlieb

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